



Michael F. Del Casino
Regulatory Division Manager

Suite 1000
1120 20th Street, NW
Washington DC 20036
202-457-2023
FAX 202-263-2616

September 12, 2003

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington D.C. 20554

**Re: *Ex Parte* Presentation - CG Docket No. 02-386
Joint Petition to Implement Mandatory Minimum
Customer Account Record Exchange Obligations**

Dear Ms. Dortch:

In the above-captioned proceeding, the Commission is considering whether to issue a Notice of Proposed Rulemaking to address problems due to the lack of exchange of customer records between local exchange carriers ("LECs") and interexchange carriers ("IXCs") that have arisen in the wake of developing competition in local markets. The petition filed by the Joint Petitioners -- AT&T, Sprint and WorldCom d/b/a MCI -- requests that the Commission impose mandatory minimum Customer Account Record Exchange ("CARE") requirements on all LECs and IXCs.

During a previous meeting, the Consumer & Governmental Affairs Bureau staff requested documentation that discussed the history of CARE. The following documents are being provided in response to that request:

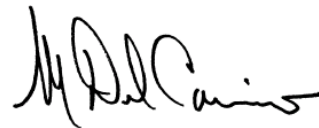
1. October 25, 2002 letter from Megan L. Campbell, General Counsel of the Alliance for Telecommunications Industry Solutions ("ATIS") to William Maher, Chief of the Wireline Competition Bureau. This letter provides a detailed description of the history of the Alliance for Telecommunications Industry Solutions ("ATIS"). ATIS, originally known as the Exchange Carrier Standards Association ("ECSA"). ATIS was created by the telecommunications industry to facilitate the implementation of equal access and the cooperation among telecommunications providers mandated by the Modified Final Judgment ("MFJ"). Today, ATIS is a global leader in the development of telecommunications standards and operational guidelines and has 124 member companies, representing nearly every sector of the telecommunications industry. The Carrier

Liaison Committee of ATIS in turn created the Ordering and Billing Forum (“OBF”) to establish guidelines for administering the equal access carrier selection process. OBF established voluntary industry standards for CARE among carriers. These standards were developed to facilitate the exchange of end user account information to allow LECs to provide services necessary to process pre-subscription changes so that they could comply with their obligation to provide all IXCs with access that is equal in type, quality, and price to that provided to AT&T and their affiliates.

2. *In the Matter of MRS and WATS Market Structure, Phase III*, CC Docket No. 78-72, Notice of Proposed Rulemaking, released May 31, 1983 **and** Report and Order, released March 19, 1985. As a result of this Order, the ECSA (now known as ATIS) established the Carrier Liaison Committee to take over the responsibilities and functions, previously held by AT&T pre-divestiture, for the centralized technical and construction planning for interexchange and local distribution networks and national security and emergency communications facilities. See specifically paragraphs 70 through 82 of the Order.
3. *In the Matter of MRS and WATS Market Structure, Phase III*, CC Docket No. 78-72, released January 17, 1985, Memorandum Opinion and Order. This Order was issued in response to a petition filed by Lexitel requesting the FCC to establish an industry forum for resolving certain problems experienced by IXCs seeking to obtain equal access interconnection with the LEC facilities. The FCC concluded that interconnection planning functions should be implemented through participation in the T1 committee sponsored by the ECSA.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission’s rules.

Sincerely,

A handwritten signature in black ink, appearing to read "M. DelCarmine", with a stylized, cursive script.

Attachments

cc: Alexis Johns